

U.S. COURTS

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STEPHEN W. KENYON
CLERK, DISTRICT OF IDAHO

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SARAH BETH DAY,
ANDREA JOYCE STEELE,

Defendants.

Case No. **CR - 18 - 0169 - N - DCN**

INDICTMENT

18 U.S.C. § 2

21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii),
846, and 853

The Grand Jury charges:

COUNT ONE

**Conspiracy to Distribute and Possess with
Intent to Distribute Methamphetamine
21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii) and 846**

Beginning on or about at least in March 2017, and continuing to on or about March 17, 2018, in the District of Idaho and elsewhere, the defendants, SARAH BETH DAY and ANDREA JOYCE STEELE, knowingly and intentionally combined, conspired, confederated and agreed with each other and other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute controlled substances to-wit: fifty grams or more

of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

**Possession with Intent to Distribute Methamphetamine
21 U.S.C. § 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2**

On or about March 17, 2018, in the District of Idaho, the defendants, SARAH BETH DAY and ANDREA JOYCE STEELE, knowingly and intentionally possessed with intent to distribute fifty grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and aided and abetted the same, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii); and Title 18, United States Code, Section 2.

CRIMINAL FORFEITURE ALLEGATION

**Drug Forfeiture
21 U.S.C. § 853**

Upon conviction of the offense alleged in Counts One and Two of this Indictment, the defendants, SARAH BETH DAY and ANDREA JOYCE STEELE, shall forfeit to the United States any and all property, real and personal, tangible and intangible, consisting of or derived from any proceeds the said defendants obtained directly or indirectly as a result of the foregoing offenses; and any and all property, real and personal, tangible and intangible, used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the foregoing offenses. The property to be forfeited includes, but is not limited to, the following:

1. Unrecovered Cash Proceeds and/or Facilitating Property. The defendant obtained and controlled unrecovered proceeds of the offense of conviction, or property derived from or

traceable to such proceeds, and property the defendant used to facilitate the offense, but based upon actions of the defendants, the property was transferred, diminished, comingled, or is otherwise unavailable.

2. Substitute Assets. Pursuant to 21 U.S.C. § 853(p) and other applicable statutes, the government will seek forfeiture of substitute assets, “or any other property of the defendants” up to the value of the defendants’ assets subject to forfeiture. The government will do so when the property subject to forfeiture cannot be forfeited for one or more of the following reasons:
- a. Cannot be located upon the exercise of due diligence;
 - b. Has been transferred or sold to, or deposited with, a third person;
 - c. Has been placed beyond the jurisdiction of the court;
 - d. Has been substantially diminished in value; or
 - e. Has been commingled with other property which cannot be subdivided without difficulty.

DATED this 15th day of May, 2018.

A TRUE BILL

/s/ [signature on reverse]

FOREPERSON

BART M. DAVIS
UNITED STATES ATTORNEY
By:


TRACI J. WHELAN
ASSISTANT UNITED STATES ATTORNEY